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5 **UNITED STATES DISTRICT COURT**
 6 **DISTRICT OF NEVADA**

7 -00-

8 **UNITED STATES OF AMERICA,**

9 Plaintiff,

10 vs.

11 **JAN ROUVEN FUECHTENER,**
 12 **(AKA LARS SCHMIDT)**

13 Defendant.

-) CRIMINAL INDICTMENT
-)
-) Case No.: 2:16-cr- 100
-)
-) VIOLATIONS:
-) 18 U.S.C. § 2252A(a)(5)(B) – Possession of
-) Child Pornography;
-) 18 U.S.C. §§ 2252A(a)(2) and (b) – Receipt of
-) Child Pornography;
-) 18 U.S.C. §§ 2252A(a)(2) and (b) –
-) Distribution of Child Pornography; and
-) 18 U.S.C. § 2251(d)(1)(A) – Advertising
-) Child Pornography
-) 18 U.S.C. § 2253 – Criminal Forfeiture

14 **THE GRAND JURY CHARGES THAT:**

15 **COUNT ONE**
 16 **Possession of Child Pornography**

17 From an unknown date, to on or about January 21, 2016, in the State and Federal District
 of Nevada,

18 **JAN ROUVEN FUECHTENER (AKA LARS SCHMIDT),**
 19 defendant herein, did knowingly possess any book, magazine, periodical, film, videotape,
 20 computer disk and any other material that contained an image of child pornography, as defined
 21 in Title 18, United States Code, Section 2256(8), that had been shipped and transported using
 22 any means and facility of interstate and foreign commerce; had been shipped and transported in
 23 and affecting interstate and foreign commerce; and was produced using materials that had been
 24

1 mailed, shipped and transported in and affecting interstate and foreign commerce, including by
2 computer, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

3 **COUNT TWO**
4 Receipt of Child Pornography

5 From an unknown date, to on or about January 21, 2016, in the State and Federal District
6 of Nevada,

7 **JAN ROUVEN FUECHTENER (AKA LARS SCHMIDT),**
8 defendant herein, did knowingly receive any child pornography and any material that contains
9 child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been
10 shipped and transported in and affecting interstate and foreign commerce by any means,
11 including by computer; and that had been shipped and transported using any means and facility
12 of interstate and foreign commerce, in violation of Title 18, United States Code, Sections
13 2252A(a)(2) and (b).

14 **COUNT THREE**
15 Distribution of Child Pornography

16 From an unknown date, to on or about January 21, 2016, in the State and Federal
17 District of Nevada,

18 **JAN ROUVEN FUECHTENER (AKA LARS SCHMIDT),**
19 defendant herein, did knowingly distribute any child pornography and any material that contains
20 child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been
21 shipped and transported in and affecting interstate and foreign commerce by any means,
22 including by computer; and that had been shipped and transported using any means and facility
23 of interstate and foreign commerce, in violation of Title 18, United States Code, Sections
24 2252A(a)(2) and (b).

COUNT FOUR

Advertising of Child Pornography

From an unknown date, to on or about January 21, 2016, in the State and Federal District of Nevada,

JAN ROUVEN FUECHTENER (AKA LARS SCHMIDT),

defendant herein, did knowingly make and publish, and cause to be made and published, any notice and advertisement offering to exchange, display, distribute and reproduce any visual depiction, where the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct, and such notice and advertisement was transported using any means and facility of interstate commerce, and was transported in interstate commerce by any means including by computer, in violation of Title 18, United States Code, Section 2251(d)(1)(A).

FORFEITURE ALLEGATION

(Possession of Child Pornography, Receipt of Child Pornography, Distribution of Child Pornography, and Advertising of Child Pornography)

1. The allegations contained in Counts One through Four of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a)(1), 2253(a)(2), and 2253(a)(3).

2. Upon conviction of any of the felony offenses charged in Counts One through Four of this Criminal Indictment,

JAN ROUVEN FUECHTENER (AKA LARS SCHMIDT),

defendant herein, shall forfeit to the United States of America, any visual depiction described in Title 18, United States Code, Sections 2251 and 2252A, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was

1 produced, transported, mailed, shipped or received in violation of Title 18, United States Code,
2 Sections 2251(d)(1)(A), 2252A(a)(2), and 2252A(a)(5)(B):

3 defendant herein, shall forfeit to the United States of America, any property, real or
4 personal, constituting or traceable to gross profits or other proceeds obtained from violations of
5 Title 18, United States Code, Sections 2251(d)(1)(A), 2252A(a)(2), and 2252A(a)(5)(B):

6 defendant herein, shall forfeit to the United States of America, any property, real or
7 personal, used or intended to be used to commit or to promote the commission of Title 18,
8 United States Code, Sections 2251(d)(1)(A), 2252A(a)(2), and 2252A(a)(5)(B) or any property
9 traceable to such property:

- 10 (1) Apple MacBook Air Laptop, Model A1466, S/N C02LT0JWF74, w/ SanDisk
11 Memory Card and Charger;
- 12 (2) Apple iMac All in One CPU;
- 13 (3) Apple wireless mouse and keyboard;
- 14 (4) My passport Ultra external hard drive S/N WXP1EC4A6325;
- 15 (5) Netgear, Model EX7000, S/N 46D1547RA189D;
- 16 (6) Netgear Nighthawk WiFi Router, S/N 3V01485301A5O w/ Power Cord;
- 17 (7) iPad 64GB, S/N J3024C81ETB;
- 18 (8) Iomega hard drive, S/N 55BV121O45;
- 19 (9) Apple iPad Air, Model A1474, S/N DVPLN7T3FK7;
- 20 (10) Iomega hard drive, S/N 316441800;
- 21 (11) MacBook Air, Model A1304, S/N W89391VT9A7;
- 22 (12) Sony Laptop Computer, S/N 283320515104663 in black case w/ Power Cord;
- 23 (13) Apple MacBook laptop, Model A1286, S/N C02N3C9CDV;

1 (14) Apple Laptop, Model A1286, S/N W8017MAVAGU;

2 (15) Apple MacBook Pro, Model A1398, S/N CO2L33X8FFT1;

3 (16) Black/Grey WD MyPassport USB HDD, S/N WXB1AC41RPA;

4 (17) Apple iPod 160GB, Model A1238, S/N 8K3448N9Z4;

5 (18) 8GB Transcend USB;

6 (19) 2 DVD's and 6 mini disks;

7 (20) External USB Hard Drive – blue;

8 (21) External USB Hard Drive, S/N WX91C8OAA4434T;

9 (22) SanDisk 32GB Memory Card;

10 (23) WD External HD, S/N WCC4E2DVZ6R2;

11 (24) Black select desktop HD – Iomega, S/N XRAA379148;

12 (25) Alarm Clock Recording Device Magnasonic, Model P1300, Tg#130100692;

13 (26) Alarm Clock Recording Device Magnasonic, Model P1300, Tg#130100691;

14 (27) Seagate External Hard Drive, S/N NA5R1GK4;

15 (28) HP Pavilion DV8000, S/N CND6151SDY;

16 (29) Gateway Desktop, Model SX803-2E, S/N PTG6S0200111105D21496C;

17 (30) Apple iMac All in One;

18 (31) Apple iMac All in One;

19 (32) Apple iMac All in One;

20 (33) Black Apple iPhone, Model A1332, ic: 597C-E2380A;

21 (34) Iomega hard drive, S/N TGBK421146; and

22 (35) Lexar 16 GB Thumb Drive

23 (all of which constitutes property).

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1 All pursuant to Title 18, United States Code, Sections 2251(d)(1)(A), 2252A(a)(2),
2 2252A(a)(5)(B), 2253(a)(1), 2253(a)(2), and 2253(a)(3).

3 **DATED:** this 30th day of March, 2016.

4 **A TRUE BILL:**

5 *[Signature]* /S/
6 FOREPERSON OF THE GRAND JURY

7 DANIEL G. BOGDEN
8 United States Attorney
9 *[Signature]*
10 LISA C. CARTIER GIROUX
11 Assistant United States Attorney

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